

REMARKS

Amendments to the Claims

Claims 1, 6, 13, 21, 26, 27, and 29-31 have been amended to address the Office's objections. No new matter is introduced by these amendments.

Independent claims 1, 8, 15, and 23 have been amended to address the Office's rejections under 35 USC § 112. Support for these amendments is found at least in paragraphs [0008], [0022]-[0024], and [0033]-[0036] of the specification. Accordingly, no new matter is introduced by these amendments.

Claim Objections

The Office objected to claims 1, 15, and 23 for containing a typographical error. Applicant thanks the Examiner for pointing out this error and has amended claims 1, 25, and 23 according to the Examiner's suggestion.

Claims 6, 13, 21, and 30 were objected to under 37 CFR § 1.75(c) for being improper dependent claims. Applicant has canceled claims 6, 13, 21, and 30.

Claims 26, 27, and 29-31, directed to a GUI, were objected to for depending on claim 23, directed to a computer readable medium. Applicant has amended claims 26, 27, 29, and 31 to be directed to a computer readable medium.

In light of these amendments to the claims, Applicant respectfully requests that all of the objections be withdrawn.

Claim Rejections – 35 USC § 112

All of the pending claims were rejected as indefinite because independent claims 1, 8, 15, and 23 were unclear.

Applicant has amended these independent claims to clarify that the message file is separate from the copied database script, and that the message file comprises a correspondence between the

source language string literal and the label that was substituted for it in the copied database script.

In light of this amendment to the independent claims, Applicant respectfully requests that the Office withdraw the 35 USC § 112 rejections of every pending claim.

Claim Rejections – 35 USC § 102(e)

The Office rejected claims 1, 5-8, and 12-14 as anticipated by U.S. Patent No. 7,177,793 issued to Barker.

The Presently Claimed Invention

The present invention provides *inter alia* a method for translating a database script, wherein the original database script is left unaltered. Paragraph [0033]. The resulting translated database script is identical to the original database script, with the exception of the string literals which have been translated into a target language that is different from the source language. Paragraphs [0033]-[0035].

The Barker Reference

Barker discloses a “system and method providing national language support for management models that interface with one or more system consoles.” Barker col.1 1.31-33. Distributable media is created for distribution to and installation by customers. Barker col. 4 1.9-11. The distributable media is based on a management definition object, such as a CIM MOF file. Barker col.4 1.14. National Language Support (NLS) files are separate from the MOF file and are included in the distributable media. Barker col 4. 1.26-29.

The end user has a pre-existing management system console. Barker col.9 1.14-16. The console displays on screen translated strings originally extracted from the management definition object and translated into NLS data files, with which the console interfaces. Barker col.11 1.33-62; Figure 14. Although these translations of strings are displayed on screen, a translation of the original MOF file itself is not created. Instead, “a unique identifier is assigned to each translatable string [and] is included in the management definition object as well as the various translation files.” Barker col.2 1.48-50. “When display text, such as text that appears on a menu, is retrieved the

identifier is located in the management definition object. The translation file corresponding to the user's preferred language is searched for the translated string" which is then displayed on screen. Barker col.2 1.53-57.

The Barker Reference Distinguished

Barker does not disclose a method of translating a database script. Indeed, Barker is not directed to database scripts at all. Instead, it provides a method of manufacturing and distributing management model software with national language support. When the end user runs the management system console with the MOF file as input, the MOF file itself is not translated. Rather, only strings that are displayed on a display screen are translated. Whereas the result of the present invention is a translated database script, the result of Barker is not a translated MOF file. Furthermore, a MOF file is not a database script in the first place.

Furthermore, claim 1 requires "substituting a source language string literal in the copied database script with a label." Barker does not provide a copied database script, and therefore does not substitute a source language string literal in a copied database script with a label.

The same arguments apply to the rejection of independent claim 8.

As Barker does not teach each limitation of claim 1 and claim 8, Applicant respectfully requests that the rejections be withdrawn.

Claim Rejections – 35 USC § 103

The Office rejected claims 2-4, 9-11, 15, 18, 20-23, 26-27, and 29-31 as obvious over Barker in view of U.S. Patent No. 5,778,356 issued to Heiny. "To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art." *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974); MPEP § 2143.03. In addition to the arguments related to the Barker reference presented above, the cited combination does not teach or suggest all of the claim limitations, as explained in further detail below.

Claims 2-4

As explained above, Barker does not teach every limitation of claim 1. Thus, regardless of the teachings of Heiny, a prima facie case of obviousness is not established with respect to claims 2-4.

Additionally, claim 4 requires “displaying a list of fields, field widths, and maximum field widths.” The Office contends this is taught by Heiny at Figure 12 and related text. However, Figure 12 is simply a schematic diagram of a generic list object, and is not a display of fields, field widths, or maximum field widths. Nor does the text related to Figure 12 disclose such displays. Instead, the “size” entries in Figure 12 concern the amount of storage space allocated to an object. Heiny col.11 l.17-23. These entries do not concern field width. Furthermore, Heiny’s method makes use of pointers and handles, which are not required in the present invention.

Claim 15

As explained above, Barker does not teach every limitation of claim 15. For example, Barker does not disclose at least “substituting the label in the copied database script with the target language string literal in the label file.” Contrary to the Office’s assertion, displaying translated strings on screen is not the same as inserting the target language string literal into the copied database script itself.

The Office contends that Heiny Figure 12 and related text teach “displaying a list of fields, field widths, and maximum field widths.” However, as explained above in reference to claim 4, Heiny Figure 12 and related text does not disclose displaying anything, and are related to the size of storage space, not the size of fields.

Claims 18 and 20-22

The Office rejected these claims with the same rationale used in the rejection of claims 3 and 5-7. Claims 18 and 20-22 depend from claim 15 and therefore the same arguments presented above apply, as do the arguments presented in response to the rejection of claims 3 and 5-7.

Claims 23, 26, 27, and 29-31

The Office rejected these claims with the same rationale used in the rejection of claims 15,

18, and 20-22. Therefore the same arguments presented in response the rejection of claim 15 apply.

Conclusion

Because Barker does not disclose every limitation of independent claims 1 and 8, and because the Barker/Heiny combination does not disclose every limitation of independent claims 8, 15, and 23, a prima facie case of obviousness has not been established. Accordingly, Applicant respectfully requests the Office to withdraw these rejections.

SUMMARY

If the Examiner believes that it would facilitate prosecution, Applicant's attorney, Rudolf Siegesmund, may be contacted at (214) 231-4703, or at rsiegesmund@gordonrees.com.

Respectfully submitted,

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